

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,
Debtors.¹

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

**CERTIFICATE OF NO OBJECTION REGARDING NOTICE OF MOTION FOR
ORDER INCREASING THE LIMIT ON FEES OF RETIREES COMMITTEE
PROFESSIONALS RETAINED PURSUANT TO 11 U.S.C. § 327(a)**

I, James N. Lawlor, hereby certify that as of the date hereof, I have received no answer, objection or other responsive pleading to the Notice of Motion for Order Increasing the Limit on Fees of Retirees Committee Professionals Retained Pursuant to 11 U.S.C § 327(a) (filed on June 2, 2022, at Docket No. 10467) (the “Motion”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

The undersigned further certifies that I have caused the Court's docket in these cases to be reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of the Motion, objections to the Motion were to be filed and served no later than June 15, 2022, at 4:00 p.m. (EST).

It is hereby respectfully requested that the proposed form of order (attached hereto as **Exhibit A**) approving the Motion be entered at the earliest convenience of the Court.

Dated: June 17, 2022

Respectfully submitted,

By: /s/ James N. Lawlor

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*Co-Counsel for the Official Committee of Retirees
With Life Insurance Benefit*

Exhibit A

Proposed Form of Order

**UNITED STATES BANKRUPTCY COURT ¹
SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,
Debtors.¹

Chapter 11

Case No. 18-23538 (RDD)
(Jointly Administered)

Re: Docket Index 10418

**ORDER INCREASING THE LIMIT ON FEES OF RETIREES COMMITTEE
PROFESSIONALS RETAINED PURSUANT TO 11 U.S.C. § 327(a)**

Upon the motion (the “Motion”) dated June 2, 2022 (Dckt. ECF No. 10467), of the Official Committee of Retirees With Life Insurance Benefit (“Retirees Committee”) of Sears Holdings Corporation and its affiliated debtors, for entry of an order increasing the limit on the fees of Retirees Committee professionals retained pursuant to 11 U.S.C. § 327(a), as previously set forth in the Court’s Order dated June 25, 2019 (“Formation Order”) (ECF 4357), all as more fully set forth in the Motion; and the Court having considered objections, as well as argument of counsel, if any; and the Court having jurisdiction to consider the Motion and the relief requested therein; and for the reasons set forth on the record of the June 29, 2022 hearing, it appearing that the relief requested by the Motion is necessary and in the best interests of the Debtors, their estates, and

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creditors; and due notice of the Motion having been served; and after due deliberation and sufficient cause appearing therefore,

NOW THEREFORE, IT IS HEREBY ORDERED THAT:

1. The Motion shall be and is hereby granted.
2. The budget set forth in the Formation Order shall be and hereby is amended and increased to \$350,000.
3. No further or additional notice of the Motion is required.

Dated: _____, 2022
New York, New York

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE